

**Comments on text resulting from the Terrestrial Animal Health Code
Commission Report – Sept 2005 Meeting
Submitted by the United States of America**

Appendix 3.7.6.

Guidelines for the Killing of Animals for Disease Control Purposes

General comments

The guidelines contained in Article 3.7.6.12, concerning the use of CO₂/air mixture as a method of killing pigs are not consistent with the requirements for the same procedure contained in the Guidelines for the Slaughter of Animals for Human Consumption, Article 3.7.5.7, Item 4; Gas Stunning: Part (a) – Stunning of pigs by exposure to carbon dioxide (CO₂). There are discrepancies for the same procedure using CO₂/air mixture in pigs between the two sets of proposed guidelines 1) Killing of Animals for Disease control Purposes and 2) Slaughter of Animals for Human Consumption. For example, in the Slaughter of Animals for Human Consumption, Article 3.7.5.7, Item 4, Parts (a - c) CO₂ may be used as a method for stunning both pigs and poultry with no restrictions on the ages of the animals. However, in the Guidelines for the Killing of Animals for Disease Control Purposes, Article 3.7.6.12, item (2) states that the use of CO₂/air mixture is suitable for only neonatal pigs, sheep etc. We recommend that similar and/or identical requirements contained within the various sets of guidelines be worded similarly and formatted consistently were indicated to clarify their intent for the reader.

Specific Comments

Article 3.7.6.1

General principles

Current proposed text:

Item 1: All personnel involved in the humane killing of animals should have the relevant skills and competencies. Competence may be gained through formal training and/or practical experience. This competence should be demonstrated through a current certificate from an independent body accredited by a Competent Authority.

Suggested proposed text:

Item 1: All personnel involved in the humane killing of animals should have the relevant skills and competencies. Competence may be gained through formal training and/or practical experience. ~~This competence should be demonstrated through a current certificate from an independent body accredited by a Competent Authority.~~

Comment/Rationale:

There is no scientific basis to require the demonstration of competence through a certification program; therefore the text should be deleted. Competence of personnel

involved in the killing of animals should be demonstrated through adequate training and experience to address the humane killing of the animals.

Current proposed text:

Item 2: As necessary, operational procedures should be adapted to the specific circumstances operating on the premises and should address, apart from animal welfare, operators safety, biosecurity and environmental aspects.

Suggested proposed text:

Item 2: As necessary, operational procedures should be adapted to the specific circumstances operating on the premises and should address, apart from animal welfare, animal age and other characteristics, euthanasia method aesthetics, operator skill requirement, cost of the method, operators safety, biosecurity and environmental aspects.

Comment/Rationale:

The text should be added to the guideline because other criterion should be considered to provide effective and implementable euthanasia methods. The characteristics of the animal (age, stage of production, etc.), the cost of the euthanasia method, the aesthetics of the procedure as perceived by the operator and the skill level needed by the operator are additional issues that should be included in the general principles.

Article 3.7.6.2

Organizational structure

Current proposed text:

Disease control contingency plans should be in place at a national level and should contain details of management structure, disease control strategies and operational procedures; animal welfare considerations should be addressed within these disease control contingency plans. The plans should also include a strategy to ensure that an adequate number of personnel trained competent in the humane killing of animals is available. Local level plans should be based on national plans and be informed by local knowledge.

Suggested proposed text:

Disease control contingency plans should be in place at a national level and should contain details of management structure, disease control strategies and operational procedures; animal welfare considerations should be addressed within these disease control contingency plans. The plans should also include a strategy to ensure that an adequate number of personnel trained competent in the humane killing of animals is available. Local level plans should be based on national plans and be informed by local knowledge.

Comment/Rationale:

The proposed text should include an explanation of what is meant by the term “local knowledge”. The text should be deleted until the term “local knowledge” is defined or

clarified. The clarification should include an explanation of the difference or similarities of local knowledge and customs.

Article 3.7.6.3

Responsibilities and Competencies of the specialist team

Current proposed text:

Item 3: Animal handlers, Parts (a) Responsibilities and (b) Competencies – subparts (i) – (iii)

a) Responsibilities

- i) review on-site facilities in terms of their appropriateness;
- ii) design and construct temporary animal handling facilities, when required;
- iii) move and restrain animals.

b) Competencies

- i.) an experience of Animal handling in emergency situation and in close confinement is required;
- ii) an appreciation of biosecurity and containment principles.

Suggested proposed text:

Item 3: Animal handlers, Parts (a) Responsibilities –subpart (i)-(iv) and subpart (b) Competencies – subparts (i) – (iii)

a) Responsibilities

- i) review on-site facilities in terms of their appropriateness;
- ii) design and construct temporary animal handling facilities, when required;
- iii) move and restrain animals.

iv) continuously monitor animal welfare and biosecurity procedures

b) Competencies

- i.) an experience of Animal handling in emergency situation and in close confinement is required;
- ii) an appreciation of biosecurity and containment principles;
- iii) ability to assess animal welfare, especially the effectiveness of handling and associated procedures, and to correct any deficiencies.

Comment/Rational:

We recommend that the animal handlers' responsibilities and competencies include ensuring that handling techniques do not compromise animal welfare and that the restraint process is effective in without causing additional pain or stress to the animal.

Table summarizing killing methods described in Articles 3.7.6.6 – 3.7.6.17

Current proposed text:

Item 1: The proposed guidelines in the table recommend the on-farm use of a free bullet as an approved procedure for killing neonatal pigs.

Suggested proposed text:

Delete all references to the use of free bullet as acceptable on – farm killing procedure for neonatal pigs from the table.

Comment/Rationale:

Our experts state that the use of a free bullet is not an appropriate on-farm killing method of neonatal pigs because it is difficult to ensure painless euthanasia and operator safety.

Comment/Rationale:

Articles 3.7.6.6 – 3.7.6.15 address euthanasia in pigs based on the division of pigs into classes of neonates and all others. This break down of pigs into only 2 groups/classes for euthanasia is not based on the specific needs of the animals. Our experts recommend that methods of euthanasia for pigs be based on different groups/classes based on ages and weight ranges. All pigs other than neonates should not automatically be grouped together for a specific method of humane killing. The table below provides size-related appropriateness of various euthanasia methods. (Source: National Pork Board, “On Farm Euthanasia of Swine – Options for the Producer”)

Table 1: Size-related Appropriateness of Various Euthanasia Methods in Swine					
	Farrowing pig less than 3 weeks (12# or 5.5 kg)	Nursery pig less than 10 weeks (70# or 32 kg)	Grower pig (less than 150# or 68 kg)	Finisher pig (greater than 150# or 68 kg)	Mature animal, sows or boars
Carbon Dioxide (CO ₂)*	yes	yes	not practical	not practical	not practical
Gunshot	no	yes	yes	yes	yes
Captive Bolt	no	yes	yes	yes	yes
Electrocution	yes	yes	yes	yes	yes
Anesthetic overdose	yes	yes	yes	yes	yes
Blunt trauma	yes	no	no	no	no
* CO ₂ means Carbon Dioxide, NOT Carbon Monoxide (CO). Carbon Monoxide is a method of euthanasia but is not currently recommended because of its high potential as a human health hazard.					

Article 3.7.6.6.

Free Bullet

Current proposed text:

Item 2: Requirements for effective use – Figure 2: The optimum position for hornless sheep and goats is on the midline.

Suggested proposed text:

Item 2: Requirements for effective use – Figure 2: The optimum position for hornless sheep and goats is on the midline just above the eye level, and directing the shot down the line of the spinal cord.

Comment/Rationale:

We recommend that the text under Figure 2 not be deleted from guideline. The text proposed for deletion clarifies the optimum position that should be used to direct a free bullet for humane killing in hornless sheep and goats.

Article 3.7.6.9.

Maceration

Current proposed text:

Item 4: Disadvantages, Parts (a-b)
a) Specialized equipment is required
b) Macerated tissues may present a biosecurity issues

Suggested proposed text:

Item 4: Disadvantages, Parts (a-c)
a) Specialized equipment is required
b) Macerated tissues may present a biosecurity issues
c) The cleaning of the equipment can be a source of contamination.

Comment/Rationale:

The equipment used in this procedure is very difficult to clean. The individual responsible for cleaning it can become a source of cross contamination.

Article 3.7.6.12.

CO2/air mixture

Current proposed text:

Item 2: Method 1 – Part (c), subpart (i): The need for properly designed container or apparatus.

Suggested proposed text:

Item 2: Method 1 – Part (c), subpart (i): The need for a properly designed container or apparatus.

Comment/Rationale:

There is a typographical error in the proposed text. The word a should be added to the text to ensure the reader comprehends intent of the guideline. Additionally, a definition should be provided for a properly designed container or apparatus.

Article 3.7.6.15.

Lethal injection**Current proposed text:**

Item 2: Requirements for effective use – Part (c): Intravenous administration is preferred, but intraperitoneal or intramuscular administration may be appropriate, especially if the agent is non-irritating.

Suggested proposed text:

Item 2: Requirements for effective use – Part (c): Intravenous administration is preferred, but intraperitoneal or intramuscular administration may be appropriate, only if especially if the agent is non-irritating and it is labeled for administration in this manner.

Comment/Rationale:

Usually the label lists if a compound that is designed for lethal intra-venous injection may be administered by other injection routes such as, intra-peritoneal or intra- muscular.